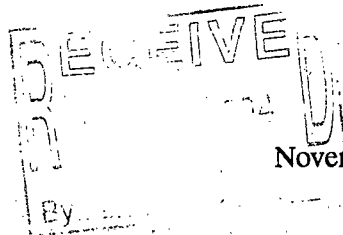


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140411
November 18, 1994
TCN 4238

Ms. Debra Rossi (3HW42)
U. S. Environmental Protection Agency
Region III
841 Chestnut Building
Philadelphia, PA 19107

Dear Ms. Rossi:

SUBJECT: NCR MILLSBORO SITE, WORK ASSIGNMENT #92-38-3PH8, ARCS
CONTRACT #68-W8-0092

We have completed our review of the Terra Vac proposal to conduct the air sparging/soil vapor extraction (AS/SVE) pilot test, as submitted to the USEPA October 27, 1994 by Environmental Strategies Corporation (ESC). This letter provides our comments on this proposal and recommendations for further activities under this phase of site activities.

The submitted proposal calls for the development of a Work Plan to specifically address the activities of Terra Vac with respect to the pilot test. This "Specific" Work Plan does not discuss several key items (*i.e.*, waste disposal) which are necessary to provide a concise definition of the entire scope of work to be performed during this phase of the site activities. In order to provide a general, all encompassing "Site" Work Plan, Tetra Tech recommends that ESC provide a work plan which supplements the Terra Vac specific Work Plan. The following paragraphs address the information which should be included in each of these respective work plans.

Terra Vac's proposal appears to have sound overall technical competence and should be adequate in assessing the applicability of AS/SVE at the site. Tetra Tech recommends that the proposal be accepted, provided the following items are included and/or clarified by Terra Vac in their Specific Work Plan for this study.

- The flow rate and pressure of the air sparging system need to be clarified. In the proposal these values are discussed as 10-12 psi and 15 cfm, respectively in Section 3.2.2 and as 5 psi and 45 cfm, respectively in Section 4.2.
- Screen slot size of the vapor extraction wells needs to be clarified. The screen slot size is referred to both as 0.02 and 0.20.
- The Specific Work Plan should discuss the collection and analyses methods that will be employed to obtain the data on the volatile organic compounds (VOC) concentrations in the vapors prior to and post carbon adsorption. A Quality Assurance Project Plan (QAPP) should supplement the Work Plan for the sampling collection and analyses to be performed as part of this study.

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Once these comments have been addressed, ESC should develop a Site Work Plan, to be submitted to the USEPA, which includes at a minimum Terra Vac's Work Plan, requirements of CERCLA guidance, as well as the following key issues.

- A pilot test project schedule should be provided. At a minimum the schedule should include major report submission dates, review periods for the USEPA, and major construction/field activities.
- Methods for disposal of all pilot test derived waste (*i.e.* drill cuttings) should be defined.
- A discussion on the required permits needs to be incorporated into this Work Plan. Of particular concern is the requirement for an air permit or air permit waiver/variance for the performance of a short duration pilot test.

Tetra Tech suggests that this Site Work Plan be provided to the USEPA prior to the implementation of any on-site activities related to this pilot test and adequate time be given to the USEPA for their review. If you have any questions, please feel free to call.

Sincerely,



Moazzam L. Khan, P.E.
Work Assignment Manager

jp

cc: Jim McKenzie
Al Pinero
Steve Pollak

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